EXHIBIT A

Proposal 1B: Coordination Among Class Cases Only[1]

Issue	Terms
Scope of Coordination / Safety Valve Depositions	• Absent good cause, no individual is deposed more than once across the Class Cases, unless designated as a Rule 30(b)(6) witness or an expert who issues reports in multiple cases • No Safety Valve Depositions
Cross-Production	• OpenAI will cross-produce all documents and written discovery in the Class Cases, except that (1) OpenAI does not need to produce any documents to the S.D.N.Y. Class Plaintiffs that relate only to UCL claims, and (2) OpenAI does not need to produce any documents to the N.D. Cal. Class Plaintiffs that relate only to claims against Microsoft. Microsoft does not need to cross-produce documents or written discovery.
Plaintiff Side Allotted Hours	• 280-hour cap to be shared by the Class Plaintiffs • This cap includes time for third-party depositions and Rule 30(b)(6) depositions
Defendant Side Allotted Hours	• 250-hour cap to be shared by Defendants across Class Cases • No more than 10 hours from any one named Plaintiff.
Per-Witness Time Limits (for depositions taken of Defendants' 30(b)(1) witnesses)	• Time limit of 10 hours per witness (if solely in individual capacity), to be shared by the Class Plaintiffs as they see fit
Rule 30(b)(6) notices	• Class Plaintiffs will serve consolidated 30(b)(6) notices • Class Plaintiffs may serve up to two 30(b)(6) notices on each Defendant Group,[2] one of which must be limited to custodial topics. "Custodial topics" include the storage and retention of information, employee use of software, programs, or tools, the structure of the relationship between Defendants, the organizational structure of Defendants, and other topics not directly related to the merits of the case that may reasonably inform or cabin subsequent discovery.
Rule 30(b)(6) time limit	• If any Defendant designates two or fewer individuals to testify regarding all topics set forth in a Rule 30(b)(6) notice, the class cases are entitled to at least 20 hours of testimony from those individuals or individual.
Expert Depositions	• This agreement does not apply to and shall not limit the number and duration of depositions of experts. • The Parties shall endeavor to negotiate in good faith a separate protocol governing expert depositions.

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[1] The Class Cases include the SDNY Class Cases, and the California Class Cases (*Tremblay, et al. v. OpenAI, Inc.*, et al., (N.D. Cal. No. 3:23-cv-03223); *Silverman, et al. v. OpenAI, Inc, et al.*, (N.D. Cal. No. 4:23-cv-03416); *Chabon, et al. v. OpenAI, Inc, et al.*, (N.D. Cal. No. 4:23-cv-04625). Proposal 1B is being made on behalf of the Class Plaintiffs.
[2] The two Defendant Groups are: (1) OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC, (the "OpenAI Defendants"); and (2) Microsoft Corporation.